

Frequently Asked Questions for Removing and Managing Mercury-Containing Switches Found in Vehicles

The questions and answers that follow apply only to vehicle mercury switches that are managed as universal waste.

Who has to remove mercury switches?

You have to remove mercury switches only if you crush, bale, shear or shred a vehicle that contains one or more mercury switches.

Where can I get information on how to find mercury switches in the vehicles?

Appendix A of the DTSC Self-training Manuals for Auto Dismantlers and Auto Repair Shops lists the vehicles that are currently known to have mercury switches in their hoods and trunks. The manuals are available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury. The list is based on currently available information. The list will be revised as new information is gathered.

Who enforces these regulations?

The Certified Unified Program Agencies (CUPAs) and DTSC. CUPAs are local enforcement agencies that are responsible for coordinating and enforcing environmental and emergency management programs.

Vehicles have many mercury switches. How many of these switches can be found in vehicles and which ones do I have to remove?

Aside from the mercury switches that are used to turn the hood and trunk lights on and off, other mercury switches can be found in certain dome lights, glove compartment lights and inside ABS systems, which may contain as much as four switches. Currently, only hood and trunk light mercury switches are required to be removed.

Do all vehicles use mercury switches for their hood and trunk lights?

No. Many foreign vehicles use mechanical or ball-bearing switches that do not contain mercury. Some of the newer domestic vehicles no longer use mercury switches.

Can anyone remove and handle mercury switches?

Yes. If you handle, or if you are responsible for managing mercury switches, then you must be familiar with how to properly handle mercury switches and you must also be familiar with emergency response procedures in case of accidental spills or releases of mercury.

Is it difficult to remove mercury switches from vehicles?

Removing mercury switches from vehicles is simple and easy as long as you know where to look for them and you know how to remove them. For more information, please refer to the DTSC Self-training Manuals for Auto Dismantlers and Auto Repair Shops, which are available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.

Is the end-of-life vehicle considered a hazardous waste if the mercury switches are not removed?

Yes. They are considered hazardous waste. Vehicles, or portions of vehicles will be considered hazardous waste on the date you decide to crush, bale, shear or shred them if they still have a hood or trunk mercury light switch.

Are shredders and dismantlers required to verify that mercury switches have been removed from the vehicles they receive?

Yes. Anyone who crushes, bales, shears or shreds vehicles must verify that the mercury switches have been removed before crushing, baling, shearing or shredding the vehicle.

You can crush, bale, shear or shred vehicles you receive that have been in accidents and are too damaged to safely remove the mercury switches.

Will I be compensated for removing and recycling mercury switches?

No. The regulations currently have no provisions that provide compensation for removing mercury switches from vehicles

How much will it cost to properly dispose the mercury switches?

Most waste haulers will charge between \$200 and \$500 to dispose a 5-gallon container. This is a flat fee that is based on the size of the container and not on the number of mercury switches.

Can I sell the mercury switches?

Yes. The mercury switches can be sold to anyone who intends to use the mercury switches as-is, and does not intend to dispose/recycle the mercury switches or recover the mercury.

Can I sell hoods and trunks that contain mercury switches?

Yes. Vehicle parts that contain mercury switches can be sold as-is for spare parts. They must, however, be treated as universal waste if they are sold to someone who intends to crush, bale, shear or shred them.

What kinds of records do I need to keep if I dismantle or recycle (i.e., crush, bale, shear or shred) vehicles?

The recordkeeping requirements are for tracking the number of vehicles and mercury switches. Sample recordkeeping forms are available in the DTSC Model Recordkeeping Forms document. The document is available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.

What kinds of records do I need to keep if I ship or receive mercury switches that have been removed from end-of-life vehicles?

An example of the records you must keep are in the DTSC Model Recordkeeping Forms document. The document is available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.

Can records be kept electronically?

Yes. There is no specific format for any of the records that you must keep.

Do I have to keep any records if I am a towing garage or a facility that doesn't dismantle or recycle vehicles, but instead sends or sells them to an auto dismantler or recycler?

Yes. Sample recordkeeping forms are available in the DTSC Model Recordkeeping Forms document. The document is available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.

What if I am a mobile vehicle crusher? Am I responsible for the same records as auto dismantlers? If so, then where do I keep my records?

The type of records you must keep will depend on the agreement between you and your customers. In general, mobile vehicle crushers are subject to the same recordkeeping requirements as auto dismantling facilities that crush, bale, shear, or shred their own vehicles (see previous Question).

What is the storage time limit for mercury switches?

You may store the mercury switches for up to 1 year. Thereafter, you must send them off site for recycling.

How should mercury switches be stored?

You may use a heavy plastic container or a lined steel container, with a securable lid. The container must be in good shape and properly labeled. The void spaces inside the container must be filled with packaging material during transport.

What is a universal waste transporter?

A universal waste transporter is anyone who transports universal waste off site. Universal waste transporters are not subject to the same requirements as hazardous waste transporters. It is easier to transport universal waste than it is to transport hazardous waste because the regulatory requirements are less stringent and more streamlined. For more information, refer to the DTSC Self-training Manuals for Auto Dismantlers and Auto Repair Shops. The manuals are available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.

Who is responsible for transporting mercury switches?

If you remove mercury switches from a vehicle, you are responsible for safely managing the removed switches and making sure they reach a facility that can properly handle the mercury switches. You can either self-transport the switches to another universal waste handler or to a destination facility (a facility that recovers mercury), or you can hire a registered hazardous waste hauler.

Can I self-transport mercury switches to another facility?

Yes. As long as that facility can properly handle mercury switches, and it is willing to accept the mercury switches.

How many mercury switches does it take to get one pound of mercury?

A mercury switch from a vehicle hood or trunk light contains approximately 1 drop of mercury. It takes approximately 450 mercury switches to get 1 pound of mercury.

Is there a chance of breaking the mercury switches?

Yes. Although most mercury switches are made of steel, which are very durable and do not easily break, there are some switches that are made of glass and should be handled more carefully.

What should I do if mercury is accidentally released?

It is a good idea to have a safety plan in place for responding to a mercury spill. You can find additional information for developing a safety plan in the DTSC Model Training Plan for Mercury Switch Waste Management and Emergency Procedures. The model training plan is available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury. You may also consult with your local fire department when developing your plan to make sure you have all the equipment and information you need to handle a mercury spill.

- DO NOT sweep up mercury with a broom.
- DO NOT vacuum a mercury spill.
- DO NOT wash contaminated clothes in a washing machine. Put the clothes in double garbage bags. Tie each bag separately. Dispose of the bag as hazardous waste.

How do I manage mercury switches that are anonymously dropped off at my facility?

You can manage the mercury switches together with the mercury switches you generate onsite. Place damaged and leaking switches inside sealed plastic bags before storing them with the rest of the mercury switches. Record the number of mercury switches you received and that they were abandoned at your facility by an unknown handler. For more information, please refer to the DTSC Consolidator BMPs, which is available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.

How do I handle containers, such as liquor bottles and cans, which are filled with mercury?

These containers are not designed to hold mercury. Whenever possible, get the sender's name and address, and report it to DTSC or your local Certified Unified Program Agency (CUPA). They will instruct you on how to manage these materials. For more information, please refer to the DTSC Consolidator BMPs, which is available on DTSC's Web site, www.dtsc.ca.gov/HazardousWaste/Mercury.